## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

:

IN RE : CHAPTER 13

JOSEPH W. SAMUELS : CASE NO: 18-17277JKF

Debtor

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## CERTIFICATION OF NO RESPONSE TO DEBTOR'S MOTION TO MODIFY PLAN

The Debtor, through counsel, hereby avers:

- On July 12, 2019, Debtor filed the above-captioned motion (the "Motion"). Doc. No.
  34.
- 2. On July 12, 2019, the Motion and Notice of Motion was served upon all secured and priority creditors.
- 3. Pursuant to Local Bankruptcy Rule 9014-3, any response to the Motion was due no later than August 2, 2019
  - 4. As of this date, no response has been filed to the Motion.

WHEREFORE, Debtor prays that the Court enter an order granting the relief requested in the Motion.

/s/ Alfonso Madrid ALFONSO MADRID, ESQ. Attorney for Debtor 757 South 8<sup>th</sup> St. Philadelphia PA 19147 (215) 925-1002 (215) 689-4809 (fax)